

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS - DALLAS DIVISION**

DANIEL ROMANOWSKI	§	
Petitioner,	§	
v.	§	3:17-CV-02614-N
	§	
WELLS FARGO, N.A.,	§	
Registrant.	§	

NORRED’S MOTION TO WITHDRAW AS ATTORNEY OF RECORD

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW Warren V. Norred and the firm of Norred Law, PLLC (“Norred”) to file this Motion to Withdraw as Attorney of Record for Daniel Romanowski ("Romanowski") pursuant to Local Rule 83.12, and in support thereof respectfully shows the Court as follows:

1. Norred was employed by Romanowski employed to represent him for the limited purpose of resolving this dispute with Wells Fargo, N.A. (“Wells Fargo”).
2. Romanowski’s claims against Wells Fargo center on ‘robo-calls’ which Wells Fargo claims were resolved in class action suit styled as *Markos v. Wells Fargo, N.A.*, cause no. 1:15-CV-1156-LMM in the Northern District of Georgia, Atlanta Division.
3. Norred informed counsel for Wells Fargo that he did not represent Romanowski in the Atlanta class action (and Romanowski is not a named party in the class action), but in light of the facts of the dispute, offered expedited discovery that would reveal important details that would be helpful in resolving whether or not Romanowski made a claim or not.
4. Rather than resolve the matter by simple discovery, Wells Fargo instead opted to obtain an order from the sought a remedy from the *Markos* case, where Romanowski has no attorney.
5. The honorable Judge Leigh Martin May issued an order on January 2, 2018 requiring Romanowski to dismiss his case within 30 days (See Doc. 24-1, “Order”), noting in the order

the representation made to the Atlanta court that Romanowski was served the motion to enforce and chose not to answer the motion.

6. After receiving the Order, the undersigned sent an email to Wells Fargo on January 2, 2018, after receiving a copy of the Order, asking how Romanowski was served. Wells Fargo never answered that question, leading the undersigned to believe that Wells Fargo sent the motion to enforce to him, but never properly served Romanowski, and is not properly before the Atlanta court. However, the undersigned is not a member of the Georgia bar, and is only providing his personal experience in Texas – typically, an attorney hired for one purpose and one suit is not assumed to accept service on another matter.
7. Based on the facts of this case, Romanowski cannot achieve his goals, as the rules by which the Atlanta court appears to operate allow Wells Fargo to state that a document is served without the kind of formal service that would be required before most courts with which the undersigned is familiar.
8. As the undersigned does have a copy of a federal order requiring dismissal of Romanowski's case no later than February 1, 2018 (30 days from January 2, 2018), and Romanowski does not wish to dismiss the case, and the undersigned does not wish to be sanctioned by any federal court, or to argue with a federal court 800 miles away in which he has taken no action and never appeared, he must withdraw.
9. Romanowski understands the undersigned position and agrees with the withdrawal, with the understanding that Movant will reappear if this case is not eventually dismissed and he is not in danger of disciplinary action.
10. As Movant has been ordered to cease prosecution of this case, there is no need for his continued services in this case. Unless the Atlanta court changes its order, Norred must withdraw.

11. This motion is based on good cause and is not sought for the purposes of delay.

12. Petitioner Romanowski does not oppose the withdrawal.

13. Romanowski's last known address is: Daniel Romanowski
Address: 2832 Laramie Street
City/St/Zip: Irving, TX 75062
Telephone: 817-657-0911
Email: cobra2599@gmail.com

WHEREFORE, PREMISES CONSIDERED, Movants Warren V. Norred and the firm of Norred Law, PLLC respectfully request that this Court grant their motion to withdraw from this case, and for such other and further relief to which Movants may show themselves justly entitled.

Respectfully submitted this February 28, 2018,

/s/ Warren V. Norred
Warren Norred; Texas Bar No. 24045094
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ATTORNEY FOR PLAINTIFF

VERIFICATION/DECLARATION:

"My name is Warren V. Norred. My date of birth is February 21, 1963, and my work address is 200 E. Abram, Suite 300, Arlington, Texas 76010. I have personal knowledge of the facts stated in paragraphs 1, 2, 3, 4, 6, 8, 9, 10, 11, and 12, which I declare and verify under penalty of perjury are true and correct. I believe paragraphs 5, 7 and 13 to be true based on a reasonable examination of the case.


Executed in Tarrant County, State of Texas, on the 1st day of February, 2018,

/s/Warren V. Norred
Declarant

AGREEMENT OF CLIENT:

"I agree with the allegations above and consent to Norred's withdrawal, understanding that I will be responsible for my own case until such time as I obtain other counsel.

02-01/2018
Date Signed



Dan Romanowski

CERTIFICATE OF SERVICE - I hereby certify that a true and correct copy of the foregoing document was served on February 1, 2018, on the following via CM/ECF:

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